

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

200 WATER PROPERTY OWNER, LLC, 177
FRONT STREET, LLC, 177 FRONT
MEMBER, LLC, and DUMBO
ASSEMBLAGE, LLC,

Plaintiffs,

-against-

LIBERTY MUTUAL FIRE INSURANCE
COMPANY, LIBERTY MUTUAL HOLDING
COMPANY, INC., LIBERTY MUTUAL
GROUP, INC., LIBERTY MUTUAL
INSURANCE COMPANY and LIBERTY
MUTUAL INSURANCE,

Defendants.

Civil Action No. 1:19-cv-08246

Removed from:

Supreme Court of the State of New York,
County of New York

Index No. 650168/2019

DEFENDANTS' RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Defendants Liberty Mutual Fire Insurance Company, Liberty Mutual Holding Company, Inc., Liberty Mutual Group, Inc., Liberty Mutual Insurance Company, and Liberty Mutual Insurance (collectively "Defendants"), hereby certifies as follows:

1. Liberty Mutual Fire Insurance Company is a wholly owned subsidiary of Liberty Mutual Group, Inc., which is a wholly owned subsidiary of LMHC Massachusetts Holdings Inc., which is a wholly owned subsidiary of Liberty Mutual Holding Company Inc.

2. Liberty Mutual Insurance Company is a wholly owned subsidiary of Liberty Mutual Group, Inc.

3. Liberty Mutual Holding Company Inc. does not have publicly traded stock, and, as such, there is no publicly-traded corporation that owns 10 percent (10%) or more of the stock of the company.

4. Liberty Mutual Insurance is a legal non-entity.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on the 4th day of September 2019.

**FINAZZO COSSOLINI O'LEARY
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By: 

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